

**IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE,
NASHVILLE DIVISION**

**JOHN RUFFINO and MARTHA RUFFINO,)
Husband and Wife,)
Plaintiffs,) Civil Action No.: _____
v.)
DR. CLARK ARCHER and HCA HEALTH)
SERVICES OF TENNESSEE D/B/A)
STONECREST MEDICAL CENTER,)
Defendants.)**

**AFFIDAVIT OF BRIAN MANOOKIAN
DEMONSTRATING PLAINTIFF'S COMPLIANCE
WITH TENN. CODE ANN. § 29-26-121(a)(3)(B)**

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

After first being duly sworn, the affiant, Brian Manookian, states as follows:

1. My name is Brian Manookian. I am an adult citizen, over the age of eighteen years, and am competent to make the statements contained in this Affidavit.
2. On December 30, 2016, I mailed written notice of a potential health care liability action (attached as **Exhibit 1A**), including a list of the names and addresses of all other providers who were being sent a notice, as well as HIPAA-compliant medical authorizations permitting all listed providers to obtain complete medical records from one

**EXHIBIT
1**

another, by certified mail, return receipt requested, after obtaining a Certificate of Mailing
(attached as **Exhibit 1B**), from the U.S. Postal Service to:

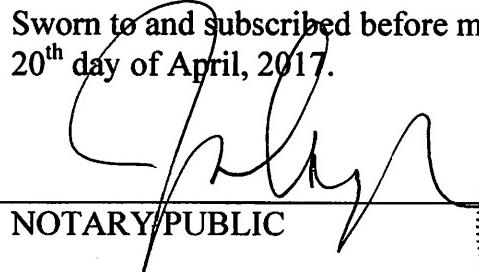
Dr. Clark Archer TriStar StoneCrest 200 StoneCrest Boulevard Smyrna, TN 37167	StoneCrest Medical Center 200 StoneCrest Boulevard Smyrna, TN 37167 StoneCrest Medical Center Registered Agent CT Corporation System 800 South Gay Street, Suite 2021 Knoxville, TN 37929
Dr. Clark Archer 2910 South Church Street Suite B Murfreesboro, TN 37127	Neurology Clinic & Associates 305 West Main Street Lebanon, TN 37087-3545 Neurology Clinic & Associates P.O. Box 414 Brentwood, TN 37024-0414

Further Affiant sayeth not.



BRIAN MANOOKIAN

Sworn to and subscribed before me this
20th day of April, 2017.



NOTARY PUBLIC

My Commission Expires:

08/20/2019

